

Duke Energy Carolinas, LLC's 2021 Avoided Cost Proceeding Pursuant to S.C. Code Ann. Section 58-41-20(A)

JULY 21, 2021

1 **Q. Please state your name, your position and your business address.**

2 **A.** My name is John C. Ahlrichs. As I previously testified, I am employed by Northbrook
3 Energy, LLC, an affiliate of Northbrook Carolina Hydro, LLC (“Northbrook”), as
4 President, and I act as asset manager for Northbrook’s South Carolina hydroelectric
5 facilities. My business address is at the company’s office at 14550 N Frank Lloyd Wright
6 Blvd, Suite 210, Scottsdale, AZ 85260.

7 **Q. Are you the same John C. Ahlrichs that offered pre-filed testimony on direct in this**
8 **matter?**

9 **A.** I am.

10 **Q. What is the purpose of the testimony you are now giving here?**

11 **A.** The purpose of this testimony is to further respond on behalf of Northbrook to the rebuttal
12 testimony of Duke Energy Carolinas, LLC’s and Duke Energy Progress, LLC’s
13 (collectively, “Duke”) witnesses Snider and Johnson.

14 **Q. Are you familiar with witness Matthew Stanley of Pelzer and Aquenergy? Have you**
15 **reviewed his most recent surrebutal testimony?**

16 **A.** Yes, I am familiar with Mr. Stanley and the surrebuttal testimony he is providing. Having
17 read his testimony, I believe all of the information offered and points made Mr. Stanley in
18 responding to Duke witnesses is well stated, accurate, and relates to Northbrook and its
19 facilities. In sum, for the same reasons offered by Mr. Stanley, Northbrook disagrees with
20 the testimony and rebuttal testimony offered by the Duke witnesses. Rather than restating
21 all of the same testimony, for the sake of convenience and efficiency, I and Northbrook
22 adopt his surrebuttal testimony as our own.

1 **Q. Do you have anything more to add to your surrebuttal testimony at this time?**

2 **A.** Just a brief closing comment. As discussed in my previous testimony, the losses being
3 sustained by small hydro facilities in South Carolina, including those of Northbrook, reflect
4 the unreasonableness of Duke's proposed avoided cost rates. Hydropower offers numerous
5 benefits to the grid, to consumers, to communities, and to the environment. Based on the
6 unique attributes and operational characteristics of small hydropower facilities, they are
7 simply not like other generation resources and avoided costs should properly reflect those
8 differences. We believe current rules call for appropriate rates to assure safe and effective
9 operation of these facilities both now and into the future. And the future is truly what's at
10 issue here. As I previously testified, nothing less than the viability of small hydro, a reliable
11 carbon-free renewable resource, is at stake. Ultimately, not acknowledging the full benefits
12 of hydro generation capacity will result in these longstanding renewable assets being lost.
13 Again, thank you for the opportunity to provide my testimony in this important matter.

14 **Q. If necessary, will you update your testimony?**

15 **A.** Yes. Northbrook reserves the right to revise and add to its testimony via supplemental or
16 amended testimony, especially if new information becomes available or known.
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